

ATTACHMENT D

FACILITY DRAFT RFA COMMENTS/RESPONSES

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COMMENT 1: Page II-4, Paragraph 1: The storage tanks and lines at No. 3 Tank Farm have been removed.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 2: Page II-4, Paragraph 3: Change "10 feet below sea level" to "10 feet above sea level".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 3: Page II-5, Paragraph 1: Remove "(40 percent leaded and unleaded)" and waxes".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 4: Page II-3, Paragraph 4: Change "NPDES Permit No. 0011096" to "NPDES No. PA 0011096".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 5: Page III-4, Paragraph 3 & 4: Move the paragraph starting with "SR&MC and PADER signed a Consent Order and Agreement on November 24, 1980.." ahead of the paragraph starting with "The 1986 NPDES permit application..." in order to keep chronological continuity.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 6: Page III-4, Paragraph 3: Change "Monitoring point 401 is a combined monitoring point for non-contact cooling wastewater ..." to "Monitoring point 501 is a combined monitoring point for off-site stormwater and non-contact cooling water..."

Additionally, delete the next two sentences "Monitoring point 501 was used...off-site. The off-site stormwater was later diverted to a DELCORA treatment plant." Off-site stormwater is conveyed through the refinery and is discharged directly to surface waters via NPDES points 501 and 020.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 7: Page III-10, Figure II-I: Remove "89 leaded".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 8: Page III-15, Figure III-3: Change "Filter Coke" to "Filter Cake".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 9: Page III-17, Figure III-4: Figure III-4 is an out of date schematic which shows typical wastewater flows in 1980. A current schematic is attached as Attachment A-1.

Response: Comment is relevant. This schematic has been added to the report, as Figure III-4a. The 1980 figure has been retained to show historical wastewater flow.

COMMENT 10: Page II-20, Paragraph 4: Change "K057" to "K051".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 11: Page III-21, Paragraph 3: Change "other off-site refineries" to "other Sun facilities".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 12: Page IV-9: Under the Section titled "History of Releases" it is stated that there is no information that spill material was removed. Please see the letter dated January 23, 1989 from SUN to PADER (Attachment A-2 to these comments). The soil residue was removed and disposed of at the Envirosafe secure landfill in Oregon, Ohio.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 13: Page IV-13: Under "Waste Managed" it is stated that wastewater may contain "up to 30 percent oil". This statement is incorrect. Concentrations of oil and grease in wastewater

are normally less than 100 ppm which is well below 30 percent.

Response: The statement concerning the concentration of oil in wastewater at this unit was based on information collected during the VSI and indicates the maximum possible concentration of oil - not what would "normally" be present. The new information on what the facility believes is the normal concentration in the wastewater has been added. However, the statement has been qualified since the facility included no data to support their statement.

COMMENT 14: Page IV-29: Under "Unit Description", "Dock 1" should be changed to "Dock 3".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 15: Page IV-29: Under "Waste Managed", the words "incinerator ash that may have been EP toxic" and "the unit may have also been the location of unlined crude oil impoundments during the history of the facility" should be deleted. These statements are untrue.

Response: The statements are based on information collected during the PR and VSI and, as indicated by the phrase "may", represent the ATK Team's judgment, based on available information. The facility failed to provide any information to refute these statements. Therefore, the report was not changed.

COMMENT 16: Page IV-28, Paragraph 3: The words "if lighted" should be changed to "is lighted".

Response: The correct page reference is IV-36. This change has been incorporated into the RFA report.

COMMENT 17: Page IV-45: Under "Dates of Operation", the date should be "1987" rather than "1979".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 18: Page IV-50: Under "Unit Description", it is stated that information was not provided on the disposal of the waste materials. Such information is available. Generally, the liquid

wastes were reprocessed through the refinery slop oil system. Emulsions were sent to a commercial TSD facility and solids were sent to an off-site commercial landfill.

Response: During the VSI, the facility was not able to provide this information. This new information has been included in the report.

COMMENT 19: Page IV-50: Under "Wastes Managed", it is stated that "chlorinated hydrocarbons" were managed in this unit. No chlorinated hydrocarbons were managed in this unit.

Response: The information on possible constituents in asphalt was obtained from available literature, as SUN did not provide this information during the VSI. The references used indicated that chlorinated solvents could be a constituent of asphalt. Since SUN has now indicated that their asphalt did not contain chlorinated solvents, this has been deleted.

COMMENT 20: Page IV-54: Under "Unit Description", waster from the 132 Tank is discharged to 16 Separator not to the "1F Separator".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 21: Page IV-58: Under "Unit Description", water from the bundle cleaning area does not flow "to the 1D oil/water separator", rather it flows to the wastewater treatment system.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 22: Page IV-60: Under "Unit Description", water is piped under not "over" the rail line.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 23: Page IV-62: Separator 1E does not exist. There is a wastewater junction box referred to as 1B Separator.

Response: These units were identified as potential historical units - not existing units. During the VSI, the facility representatives indicated that there probably were 1B and 1E separators.

Therefore, Sun needs to demonstrate that these units never existed and/or were never used to manage waste. Their comment does not include this information. Therefore, the report was not changed.

COMMENT 24: Page IV-80: Under "Waste Managed", delete the word "from" between the words "wastewater" and "contaminated".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 25: Page V-1, Paragraph 2: Delete "(40 percent leaded and 60 percent unleaded)".

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 26: Page V-2, Paragraph 1: Water is no longer drained directly to soils. It is hardpiped to the sewer system.

Response: Comment is relevant and the RFA report has been revised accordingly.

COMMENT 27: Page V-2, Paragraph 2: The substance at Dock No. 2 was identified as kerosene as soon as it was discovered. The source was also known to be an underground kerosene transfer line.

Response: During the VSI, the facility indicated that they thought this was kerosene and that the source was a product transfer line. This confirmation of contamination of groundwater has been included in the report.

COMMENT 28: Page VII-6: Unit No. 17 managed perolite or other precoat materials in addition to FCCU catalyst fines.

Response: Comment is relevant and the RFA report has been revised accordingly.